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substantively consolidated SIPA liquidation
proceedings of Bernard L. Madoff Investment
Securities LLC and the consolidated Chapter 7
Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated Liquidation of Bernard L. Madoff
Investment Securities LLC and the consolidated
Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

PETER KNOBEL and PATRICE KNOBEL,

Defendants.

Adv. Pro. No. 10-04928 (SMB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF ADVERSARY
PROCEEDING WITHOUT PREJUDICE**

Irving Picard, Esq., the Trustee for the substantively consolidated SIPA liquidation proceedings of Bernard L. Madoff Investment Securities LLC and the consolidated Chapter 7 Estate of Bernard L. Madoff (the “Trustee”), by and through his counsel, Baker & Hostetler LLP, and defendants Peter Knobel and Patrice Knobel (“Defendants”), by and through their counsel, Butzel Long, P.C. (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 2, 2010, the Trustee filed and served the Complaint against Defendants.
2. On February 19, 2014, Defendants served an Answer on the Trustee.
3. On October 4, 2017, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].
4. In accordance with Federal Rule of Bankruptcy Procedure 41(a)(1)(A)(ii), made applicable hereto by Federal Rule of Bankruptcy Procedure 7041, the Parties hereby stipulate to a dismissal of the Adversary Proceeding without prejudice and without costs to either Trustee or Defendants, subject to the right to re-open the Adversary Proceeding to seek entry of judgment pursuant to the Stipulation for Entry of Judgment, attached as Exhibit 1 to the settlement agreement.
5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.
6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and

the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 16, 2017

BAKER & HOSTETLER LLP

/s/ Keith R. Murphy

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Trustee for the substantively consolidated SIPA
liquidation proceedings of Bernard L. Madoff
Investment Securities LLC and the consolidated
Chapter 7 Estate of Bernard L. Madoff*

BUTZEL LONG, P.C.

/s/ Joshua E. Abraham

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Attorneys for Defendants Peter and Patrice Knobel

SO ORDERED

Dated: October 17, 2017
New York, New York

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE